

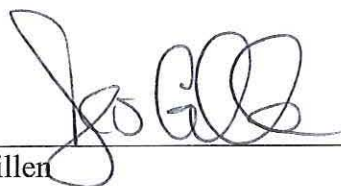
FINDING No.	CITATION	UNIT(S)	FINDINGS	CORRECTIVE ACTIONS	PROPOSED CORRECTION DATE
1	40 CFR 60.482-6a(i)	BDHT	Open Ended Lines: The audit found 1 engineered open ended line without control by cap, plug, blind, or double block valves in the inspection of the three process units. This represents an uncontrolled rate of 0.115% based on inspecting an estimated 866 potential open-ended lines.	Communicate the importance of recognizing engineered OELs during the equipment design phase using existing engineering practices. Ensure LDAR monitoring technicians have been properly trained to identify engineered OELs. Conduct routine OEL audits, utilize weekly area safety tours to identify and to improve performance. Weekly OEL KPI's are used to communicate and measure their progress of reducing/eliminating OEL's.	Completed on 1/24/2019
2	40 CFR 60.482-7a(a)(1)	Various	Missed Initial Monitoring: 1 or more valves did not receive two consecutive months of monitoring after initial installation.	Corrected compliance rule set for components found through the audit. Complete. Ensure a robust process is in place for initial rule assignments for new components added to the LDAR program. Complete	Completed 11/26/2018

3	40CFR60.482-2a(a)1	Crude 1	<p>Missed Monthly Monitoring Event: 1 Light Liquid/ Gas Vapor pump was identified to have missed 1 required monthly monitoring event.</p>	<p>Ensure rule assignments for all pumps are correct and schedule each pump for a Method 21 monitoring event each month. Train LDAR contractor on the importance of each pump in LDAR service, receiving a monthly Method 21 monitoring event. Confirm scheduling bi-monthly and monitor by 15th of each month. Any deviation from pump monitoring schedule will be emailed to LDAR Coordinator with explanation as to why a monitoring event was not performed by the deadline.</p>	Corrected 1/25/2019
4	40 CFR 60.482-7a(d)(2)	Various	<p>Late 1st Attempt at Repair: 1 or more leaks were identified to not have a documented 1st attempt at repair.</p>	<p>Corrected by revising LDAR leak communications with ops and maintenance for repairs. Data Admin is now in charge of logging all communications for all leaks and repair information received to and from ops and/or maintenance into the LDAR database. LDAR process flow created and sent to operations and maintenance as well outlining the leak repair process. All repair communications will be saved in LDAR database and electronic file for proof of completion.</p>	Completed 6/1/2018

5	40 CFR 60.482-2(c)(2)	Various	Late First Attempt at Repair: 1 or more pumps appear not to have a documented 1st attempt at repair within the 5 day timeframe.	Corrected by revising LDAR leak communications with ops and maintenance for repairs. Data Admin is now in charge of logging all communications for all leaks and repair information received to and from ops and/or maintenance into the LDAR database. LDAR process flow created and sent to operations and maintenance as well outlining the leak repair process. All repair communications will be saved in LDAR database and electronic file for proof of completion.	Completed 6/1/2018
6	40 CFR 60.482-2a(c)(1)	Various	Late Final Attempt at Repair: 1 or more pumps appear not to have a documented final attempt at repair within the 15 day timeframe.	Corrected by revising LDAR leak communications with ops and maintenance for repairs. Data Admin is now in charge of logging all communications for all leaks and repair information received to and from ops and/or maintenance into the LDAR database. LDAR process flow created and sent to operations and maintenance as well outlining the leak repair process. All repair communications will be saved in LDAR database and electronic file for proof of completion.	Completed 6/1/2018

7	40 CFR 60.482-7a(c)(2)	Various	Missed Follow Up Monitoring: 1 or more valves were identified to have missed 2 consecutive follow up monthly inspections after leak was detected.	Database Consent Decree leak work order issue currently being mitigated by manually tracking each leak and scheduling follow-up monitoring for each leak. As the cause of the database issue is identified we will correct the database and ensure the database is properly tracking leaks and follow-up monitoring events.	Corrected 6/1/2018
---	------------------------	---------	---	---	--------------------

I certify under penalty of law that I have examined and am familiar with the information in this document(s), including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(3) of the Clean Air Act and 18 U.S.C. Sections 1001 and 1341.



Des Gillen